IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

VIJAY K. VIG,)	Civil Action File No
	Plaintiff,)	1:11-cv-4487-WSD
v.)	
ALL CARE DENTAL, P.C.,)	
a Georgia Professional Corporation and			
DR. SATPAL K. SHIKH, CEO and			
60% shareholder of All Care Dental, P.C.,)	
)	
	Defendants.)	

MOTION TO STAY DISCOVERY

COMES NOW, Defendant Shikh and moves to stay discovery directed to her until 15 days after the Court rules on her motion to dismiss filed on or about May 4, 2012.

The Defendant shows that she is an individual without insurance as to this type of claim and is being victimized by her ex-husband as a result of a divorce action between the parties.

This Court has wide discretion to grant the motion. See Patterson v. U.S. Postal Service, 901 F.2d 927, 929 (11th Cir. 1990); Wilson v. BB&T Mortgage, 2010 WL 4839372 (N.D. Ga. 2010).

A proposed order is attached.

Respectfully submitted,

/s/ Ralph Goldberg
Ralph Goldberg
Ga. Bar No. 299475
Attorney for Defendants

Goldberg & Cuvillier, P.C. 755 Commerce Drive, Ste. 600 Decatur, GA 30030 (404) 378-7700 (404) 378-7708 FAX

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

VIJAY K. VIG,)	Civil Action File No.	
Plain	tiff,)	1:11-cv-4487-WSD	
v.)		
ALL CARE DENTAL, P.C.,)		
a Georgia Professional Corporation and)		
DR. SATPAL K. SHIKH, CEO and)		
60% shareholder of All Care Dental, P.C.,)		
)		
Defe	ndants.)		
CEDTIFICATE OF SEDVICE				

CERTIFICATE OF SERVICE

This is to certify that I have this day served the following individual in the foregoing matter with a copy of this document by depositing in the United States Mail copies of the same in properly addressed envelopes with adequate postage thereon or by notification of electronic filing.

Vijay K. Vig P.O. Box 1535 Decatur, GA 30033

This _____ day of July, 2012.

Goldberg & Cuvillier, P.C. 755 Commerce Drive, Ste. 600 Decatur, GA 30030 (404) 378-7700 (404) 378-7708 FAX /s/ Ralph Goldberg Ralph Goldberg Ga. Bar No. 299475 Attorney for Defendants